

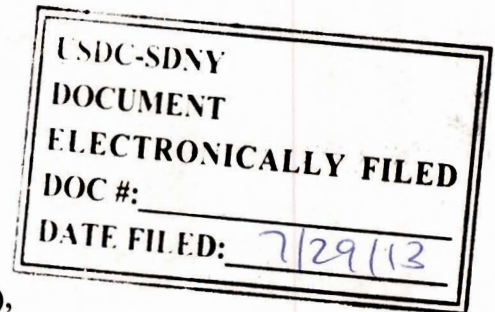
THE LAW OFFICES OF SEAN M. MAHER, PLLC

**MEMO ENDORSED**

July 26, 2013

VIA EMAIL: Abrams NYSD Chambers@nysd.uscourts.gov

Honorable Ronnie Abrams  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312



**RE: United States v. Feng Ling Liu (Vanessa Bandrich),  
Dkt. No. 12 Cr. 934 (RA)**

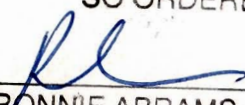
Dear Judge Abrams:

After conferring with the government and co-counsel, I respectfully write to request a consent modification of the current motions schedule.

On behalf of the parties, I am requesting a nine-day extension for all filings. Accordingly, the current schedule of defense motions by July 31, 2013, government opposition by August 21, 2013, and defense replies by September 9, 2013 would be modified to defense motions by August 9, 2013, government opposition by August 30, 2013, and defense replies by September 18. The reason for the request is that the defense needs the additional time to prepare its written submissions.

I have conferred with the government concerning the defense's request for a modification of the motions schedule and have been informed by AUSA Harris Fischman that the government consents to the defense's request. I also have conferred with co-counsel and can state that defense counsel consent to extending the government's time file its opposition papers as outlined above.

**APPLICATION GRANTED  
SO ORDERED**

  
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RONNIE ABRAMS, U.S.D.J.

7/29/13

Respectfully submitted,

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/S/  
Sean M. Maher  
Counsel for Vanessa Bandrich

cc: AUSAs Harris Fischman, Robert Boone, & Brian Blais (via email)  
All defense counsel (via email)

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